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**RICHARD W. WICKING  
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Defendant Greg A. Cortez, by and through his counsel, Patrick D. Robbins; and the  
United States, by and through its attorney, Derek Owens, Assistant United States Attorney, hereby  
stipulate and agree as follows:

20                   1. The defendant in the above mentioned case is currently being detained at the  
21 Glenn E. Dyer Detention Facility (also known as the North Country Jail). The defendant may be  
22 transferred to the custody of other correctional institutions during the pendency of this case.

24                   2. Counsel representing Mr. Cortez has received a series of 12 audio CDs  
25 containing MP3 audio files (the "MP3 Files") from the government as part of the discovery in this  
26 matter.

1           3. In order to assist his counsel with the preparation of his defense, Mr. Cortez  
2 wishes to listen to and study the MP3 Files.

3           4. Accordingly, the parties stipulate and respectfully request that the Court order  
4 that the Glenn E. Dyer Detention Facility and any other correctional institution that may now or in  
5 the future have custody over Mr. Cortez during the pendency of this case shall accept an MP3 player  
6 containing the MP3 Files, within the security regulation set by the facility for the MP3 players.

7           5. It is further stipulated that Glenn E. Dyer Detention Facility and any other  
8 correctional institution that may now or in the future have custody over Mr. Cortez during the  
9 pendency of this case shall make the MP3 player available to the defendant at a reasonable time and  
10 in a reasonable manner, so that the defendant may listen to the MP3 Files, *subject to the*  
11 *facilities rules & regulations*

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14 IT IS SO STIPULATED.

15 Dated: July 13, 2011

16           Respectfully submitted,

17           SHEARMAN & STERLING LLP  
18           Patrick D. Robbins  
19           Mikael A. Abye  
20           Lisa M. Hathaway

21           By: \_\_\_\_\_ /s/  
22           Mikael A. Abye  
23           Attorney for Defendant Greg A. Cortez

24 Dated: July 13, 2011

25           Respectfully submitted,

26           By: \_\_\_\_\_ /s/  
27           Derek Owens  
28           Assistant United States Attorney

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ORDER

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PURSUANT TO STIPULATION, IT IS SO ORDERED, *as amended*

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Dated: July 15 2011

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United States Magistrate Judge  
Timothy J. Bommer

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1 ATTESTATION: Pursuant to General Order 45, Section X.B, I hereby attest that I have obtained  
2 written concurrence from Mr. Owens with regard to the filing of this document.

3 Dated: July 13, 2011

4 By: \_\_\_\_\_/s/  
Mikael A. Abye

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